

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA**

**IN RE:**

	:	<b>CASE NO.: 13-70713</b>
<b>DALE S. DAVIDSON,</b>	:	
	:	
<b>DEBTOR.</b>	:	<b>CHAPTER 7</b>

**OBJECTION TO PROOF OF CLAIM**

Debtor, DALE S. DAVIDSON, objects to Proof of Claim Number Two, filed by Dana Ford in the amount of \$2,300,000.00 and assigns the following reasons:

1. The claim is unliquidated.
2. The claim is speculative in that it is a pending lawsuit in Walton County, Florida and a Judgment has not been entered in the case.

WHEREFORE, Debtor, DALE S. DAVIDSON, respectfully requests that this Honorable Court disallow the proof of claim filed by Dana Ford and order such other and further relief as is just and proper.

This 23<sup>rd</sup> day of January, 2015.

/s/ R. Bruce Warren  
R. Bruce Warren/ GA Bar No.: 738475  
Whitehurst, Blackburn & Warren  
809 S. Broad Street  
Thomasville, GA 31792  
229-226-2161

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a copy of the Objection to Proof of Claim Number Six, upon the following:

Kristin Hurst  
Chapter 13 Trustee  
ecf@ch13trustee.com

via email and those listed on the creditor matrix attached hereto by depositing a copy of the same in the United States mail, first class, in a properly addressed envelope with sufficient postage affixed thereto.

This 23rd day of January, 2015.

/s/ R. Bruce Warren  
R. Bruce Warren/ GA Bar No.: 738475  
Whitehurst, Blackburn & Warren  
809 S. Broad Street  
Thomasville, GA 31792  
229-226-2161

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	:	
<b>DEBTOR.</b>	:	<b>CHAPTER 7</b>

**NOTICE**

COMES NOW, the Debtor, and having filed an Objection to Proof of Claim in this bankruptcy case.

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE ANY ATTORNEY, YOU MAY WISH TO CONSULT ONE.)

IF YOU DO NOT WANT THE COURT TO GRANT THE OBJECTION TO THE PROOF OF CLAIM, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEWS ON THE OBJECTION TO PROOF OF CLAIM, THEN YOU OR YOUR ATTORNEY MUST FILE WITH THE COURT A WRITTEN REQUEST TO THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF GEORGIA, POST OFFICE BOX 2147, COLUMBUS, GA 31902-2147 FOR HEARING ON OR BEFORE **FEBRUARY 26, 2015** AND MUST SERVE A COPY OF SAID OBJECTION UPON THE ATTORNEY FOR THE DEBTOR AND A COPY UPON THE TRUSTEE.

IF YOU MAIL YOUR REQUEST TO THE COURT FOR FILING, YOU MUST MAIL IT EARLY ENOUGH SO THE COURT WILL RECEIVE IT ON OR BEFORE THE DATE STATED ABOVE.

ANY REQUEST FOR A HEARING MUST ALSO BE MAILED TO THE MOVING PARTY AND UPON ALL OTHER PERSONS INDICATED ON THE CERTIFICATE OF SERVICE ATTACHED TO THIS PLEADING.

DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE REQUEST FOR DISMISSAL AND MAY ENTER AN ORDER GRANTING THAT RELIEF.

IF ANY OBJECTIONS ARE FILED, A HEARING WILL BE HELD ON **MARCH 18, 2015 AT 10:30 A.M. IN THE U.S COURTHOUSE AND POST OFFICE, NORTH PATTERSON STREET, VALDOSTA, GA 31601.**

This the 23rd day of January, 2015.

/s/ R. Bruce Warren  
R. Bruce Warren/ GA Bar No.: 738475  
Whitehurst, Blackburn & Warren  
809 S. Broad Street  
Thomasville, GA 31792  
229-226-2161

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a copy of the Objection to Proof of Claim Number Two, upon the following:

Kristin Hurst  
Chapter 13 Trustee  
ecf@ch13trustee.com

via email and those listed on the creditor matrix attached hereto by depositing a copy of the same in the United States mail, first class, in a properly addressed envelope with sufficient postage affixed thereto.

This 23rd day of January, 2015.

/s/ R. Bruce Warren  
R. Bruce Warren/ GA Bar No.: 738475  
Whitehurst, Blackburn & Warren  
809 S. Broad Street  
Thomasville, GA 31792  
229-226-2161

Label Matrix for local noticing  
113G-7  
Case 13-70713  
Middle District of Georgia  
Valdosta  
Fri Jan 23 09:51:32 EST 2015

Thomasville National Bank  
Moore, Clarke, DuVall & Rodgers, P.C.  
c/o Edgar W. Duskin, Jr.  
PO Drawer 71727  
Albany, GA 31708-1727

Chase  
PO Box 15153  
Wilmington DE 19850-5153

Commercial Bank  
101 South Crawford Street  
Thomasville, Georgia 31792-5502

JPMorgan Chase Bank, National Association  
c/o McCalla Raymer, LLC  
Bankruptcy Department  
1544 Old Alabama Road  
Roswell, GA 30076-2102

Michael F. Coppins  
Monroe Adkins & Dincman PA  
1319 Thomaswood Dr.  
P O Box 14447  
Tallahassee, FL 32317-4447

Thomasville National Bank  
301 N. Broad Street, P.O. Box 1999  
Thomasville, Georgia 31799-1999

Dale S Davidson  
109 Tuxedo Dr.  
Thomasville, GA 31792-6760

Walter W Kelley  
Chapter 7 Trustee  
P.O. Box 70879  
Albany, GA 31708-0879

Alan B. Bookman, as Successor Personal Repre  
Alan B. Bookman, Personal Representative  
c/o Stephen G. Gunby  
P.O. Box 1199  
Columbus, GA 31902-1199

7  
901 Front Avenue  
P.O. Box 2147  
Columbus, GA 31902-2147

Chase Bank USA NA / Bank One  
PO Box 15298  
Wilmington, Delaware 19850-5298

Dana Ford  
c/o Thompson, Crawford & Smiley  
1330 Thomasville Rd.  
Tallahassee, FL 32303-5608

James Andrew Ball, IV  
702 North Ride  
Tallahassee, FL 32303-5131

Rhonda Davidson  
109 Tuxedo Dr.  
Thomasville, GA 31792-6760

Thomasville National Bank  
c/o Edgar W. Duskin, Jr.  
Moore, Clarke, DuVall & Rodgers, P.C.  
PO Drawer 71727  
Albany, Georgia 31708-1727

Mark L. Manley  
Rowell Auctions, Inc.  
PO Box 3428  
Moultrie, GA 31776-3428

Kelley, Lovett & Blakey  
Post Office Box 70879  
Albany, GA 31708-0879

Alan B. Bookman, as Personal Representative  
1111 Bay Ave  
Columbus GA 31901-5218

Circuit Court Walton County  
Walton County Clerks Office  
PO Box 1260  
DeFuniak Springs, FL 32435-1260

Estate of Deborah E. Irby  
c/o Stephen G. Gunby  
Page Scrantom Sprouse Tucker & Ford, PC  
P.O. Box 1199  
Columbus, GA 31902-1199

Kathleen Davidson  
1510 Millpond Rd.  
Thomasville, GA 31792-7407

State of Georgia  
1800 Century Center Blvd., NE  
Atlanta, GA 30345-3205

U.S. Trustee - MAC  
440 Martin Luther King Jr. Boulevard  
Suite 302  
Macon, GA 31201-7987

Ronald B. Warren  
Whitehurst, Blackburn, Warren and Kelley  
809 South Broad Street  
Thomasville, GA 31792-6112

(u)Gene L. Davidson Revocable Trust

(u)JPMorgan Chase Bank, National Association

(u)Riverview Farm of Havana, LLC

(u)The Davidson Family Limited Partnership

(u)Dana Ford

(u)Gene L. Davidson

End of Label Matrix

Mailable recipients 24

Bypassed recipients 6

Total 30